



DEPARTMENT OF ENVIRONMENTAL RESOURCES

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April 7, 2006

Brian Brattain
Central Valley Region
California Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

RE: Draft General Waste Discharge Requirements and Monitoring and Reporting Program for Discharges of Green Waste for Composting Within the Central Valley Region

Dear Mr. Brattain:

Thank you for the opportunity to comment on the draft General WDRs for composting facilities in the Central Valley of California.

As one of the agencies that coordinate waste management efforts in Stanislaus County, we have always supported composting of green organic material in an effort to divert this type of waste from landfill disposal. This priority of recycling green waste through composting has also been an emphasis of the California Integrated Waste Management Board.

We believe that any additional regulations on composting operations need to be based on proven procedures and best available economic technology. Several composting operators have expressed concern on the draft General Order that has been released for review. Most concerns center on adding significant expenses to maintaining and operating a composting site without accompanying environmental benefits.

For example, in the "Terms and Conditions of this General Order," it states that facilities that cannot demonstrate that material will remain "unsaturated" are required to provide a low permeability layer on all pads where "composting will be conducted or stored, or where additives and amendments are stored." According to the proposed draft, the layer must consist of one of the following: asphalt at least 4 inches thick, concrete at least 6 inches thick, a synthetic membrane at least 60-mil thickness, one foot of compacted clay, or an equivalent or better engineered alternative.

The composting operators that have contacted our office have stated that if this requirement is implemented, they would no longer be able to operate in the valley because of the expense to install and maintain such impermeable pads. Information on estimated costs for installing an

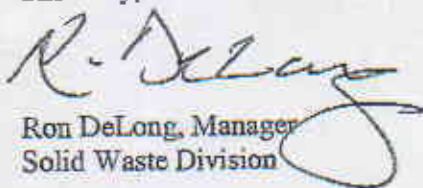
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asphalt pad of 4 inches thickness in our area is: \$1.80 per square foot, \$78,408 per acre or \$784,080 for a 10-acre site. We do not believe there is sufficient evidence to show this level of pad design is needed to protect groundwater from green organic material that is used at composting facilities in the Valley.

Dr. Horacio Ferriz, an Environmental Geologist for Stanislaus County, has suggested that a less expensive effective alternative would be to have pads with 2% or 3% grade, compacted to 95% of maximum density and with a permeability of less than 1E-05 cm/sec, and rows parallel to the inclination of the slope to facilitate drainage. There should also be a lined culvert at the base of the slope, an impermeable sump to collect the leachate, and a pump to pull leachate out of the sump and into a suitable storage tank for later sprinkling over the compost.

We believe individual composting facilities located in Stanislaus County will be responding with their comments that will provide more details of their concerns. Again, we appreciate this opportunity to comment and would like to be notified when changes or updates to the draft General Order become available. Please feel free to contact our office at (209) 525-6700 if you have any questions.

Sincerely,


Ron DeLong, Manager
Solid Waste Division